



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF STATE COUNSEL
LITIGATION BUREAU

BY ECF AND E-MAIL

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

February 12, 2021

RE: Our Wicked Lady, LLC, et al. v. Cuomo, et al., No. 21-cv-165

Dear Judge Cote:

This Office represents defendants Andrew M. Cuomo, in his official capacity as Governor of the State of New York, and the State of New York (the “State Defendants”).

We write jointly with plaintiffs and with co-defendants Bill de Blasio, in his official capacity as Mayor of the City of New York, and the City of New York (the “City Defendants”, and collectively with State Defendants and plaintiffs, the “Parties”) to request additional time to submit the joint stipulation of undisputed facts directed by the Court’s Order of February 10, 2021 (ECF no. 19).

The Parties are currently jointly working towards agreement on a stipulation of undisputed facts. However, given the complexities posed by the presence of multiple sets of defendants (both the State Defendants and the City Defendants), and the need to obtain client approval on multiple proposed drafts, the Parties do not expect to have the stipulation finalized by the current deadline.

As such, the Parties jointly request that the deadline to file the joint stipulation of undisputed facts be extended from today, Friday, February 12, 2021 to Wednesday, February 17, 2021. The defendants’ oppositions to plaintiffs’ motion for a preliminary injunction would remain due on Tuesday, February 23, 2021. Counsel for all Parties have conferred and join in this request.

The Parties appreciate the Court’s attention to this matter.

Respectfully submitted,

/s/ Matthew L. Conrad
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Honorable Denise L. Cote
February 12, 2021

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cc: Counsel of record